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Counsel for Movants Tempus International Fund SPC and Opportunity Unique Fund Inc.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

KALMAN ISAACS, individually and on behalf of all others similar situated,

Plaintiff,

v.

ELON MUSK and TESLA, INC.,

Defendants.

Case No.: 3:18-cv-04865-EMC

**DECLARATION OF
LAURENCE D. KING IN SUPPORT OF
TEMPUS INTERNATIONAL FUND SPC
AND OPPORTUNITY UNIQUE FUND
INC.'S MOTION FOR
(1) CONSOLIDATION OF RELATED
ACTIONS; (2) APPOINTMENT AS LEAD
PLAINTIFF; AND (3) APPROVAL OF
THEIR CHOICE OF LEAD COUNSEL**

Judge: Hon. Edward M. Chen

Courtroom: 5

Date: November 15, 2018

Time: 1:30 p.m.

[Additional Captions Below]

1 WILLIAM CHAMBERLAIN, on behalf of
2 himself and all other similarly situated

3 Plaintiff,

4 v.

5 TESLA, INC. and ELON MUSK,

6 Defendants.
7

JOHN YEAGER, Individually and on Behalf of
All Others Similarly Situated,

8 Plaintiff,
9

10 v.

11 TESLA, INC. and ELON MUSK,

12 Defendants.
13

CARLOS MAIA, on behalf of himself and all
other similarly situated,

14 Plaintiff,
15

16 v.

17 TESLA, INC. and ELON MUSK,

18 Defendants.
19

KEWAL DUA, Individually and on Behalf of All
Others Similarly Situated,

20 Plaintiff,
21

22 v.

23 TESLA, INC. and ELON MUSK,

24 Defendants.
25

Case No.: 3:18-cv-04876-EMC

Case No.: 3:18-cv-04912-EMC

Case No.: 3:18-cv-04939-EMC

Case No.: 3:18-cv-04948-EMC

1 JOSHUA HORWITZ, Individually and on Behalf
2 of All Others Similarly Situated,

3 Plaintiff,

4 v.

5 TESLA, INC. and ELON R. MUSK,

6 Defendants.

Case No.: 3:18-cv-05258-EMC

7 ANDREW E. LEFT, Individually and on Behalf
8 of All Other Similarly Situated,

9 Plaintiff,

10 v.

11 TESLA, INC., and ELON R. MUSK,

12 Defendants.

Case No.: 3:18-cv-05463-EMC

13 ZHI XING FAN, Individually and On Behalf of
14 All Others Similarly Situated,

15 Plaintiff,

16 v.

17 TESLA, INC., and ELON R. MUSK,

18 Defendants.

Case No.: 3:18-cv-05470-EMC

19 SHAHRAM SODEIFI, Individually and on
20 behalf of all others similarly situated,

21 Plaintiff,

22 v.

23 TESLA, INC., a Delaware corporation, and
24 ELON R. MUSK, an individual,

25 Defendants.

Case No.: 3:18-cv-05899-EMC

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27
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I, Laurence D. King, hereby declare as follows:

1. I am a partner at the law firm of Kaplan Fox & Kilsheimer LLP. I respectfully submit this Declaration in Support of Tempus International Fund SPC and Opportunity Unique Fund Inc.'s Motion for (1) Consolidation of the Related Actions, (2) Appointment as Lead Plaintiff, and (3) Approval of Their Choice of Lead Counsel. If called as a witness, I could and would competently testify thereto to all facts within my personal knowledge.

2. Attached hereto as Exhibit A is a true and correct copy of the August 10, 2018 Notice of Pendency of this Class Action on *PR Newswire* in connection with the filing of *Isaacs v. Musk*, No. 18-cv-04865.

3. Attached hereto as Exhibit B is a true and correct copy of the sworn certification of movant Tempus International Fund SPC (“Tempus”) pursuant to the Private Securities Litigation Reform Act of 1995.

4. Attached hereto as Exhibit C is a true and correct copy of the sworn certification of movant Opportunity Unique Fund Inc. (“OUF”) pursuant to the Private Securities Litigation Reform Act of 1995.

5. Attached hereto as Exhibit D is a true and correct copy of charts calculating the losses incurred by Tempus and OUF.

6. Attached hereto as Exhibit E is the Firm resume of Kaplan Fox & Kilsheimer LLP.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 9th day of October at San Francisco, California.

/s/ Laurence D. King
Laurence D. King